

ATTACHMENT 59

DECLARATION OF JAY M. BRADBURY

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

In the Matter of: :
 :
Investigation into Development of :
Electronic Interfaces for BellSouth's: Docket No. 8354-U
OPERATIONAL SUPPORT SYSTEMS :
 :

Hearing Room 110
244 Washington Street
Atlanta, Georgia

Tuesday, May 8, 2001

The above-entitled matter came on for hearing
pursuant to Notice at 10:00 a.m.

BEFORE:

LAUREN MCDONALD, JR., Chairman
STAN WISE, Vice Chairman
ROBERT BAKER, Commissioner
ROBERT DURDEN, Commissioner
DAVID BURGESS, Commissioner

* * *

1 use, the ones they would have to rely on from BellSouth,
2 BellSouth set up an entirely separate system called RSIMMS,
3 isn't that right?

4 A (Witness Weeks) Well RSIMMS existed prior to the
5 notion of a volume test. It was actually used by BellSouth,
6 as I understand it, to do certain other testing of their
7 own, and the decision was made to execute the normal and
8 peak tests in the RSIMMS environment as opposed to the
9 Encore environment.

10 Q So when you say that, the normal and peak volume
11 tests were run in RSIMMS and not in the regular production
12 system, Encore?

13 A (Witness Weeks) That's a correct statement.

14 Q Can we agree that this will be called a test
15 system as opposed to a production system?

16 A (Witness Weeks) That's fine.

17 Q Who designed RSIMMS?

18 A (Witness Weeks) BellSouth -- I assume. BellSouth
19 or their contractors.

20 Q Do you know why BellSouth wanted the volume test
21 runs in RSIMMS instead of in Encore?

22 A (Witness Weeks) It was the representation
23 BellSouth made to us that they did not have the computing
24 capacity in the production environment to sustain the
25 workloads 18 months to two years hence.

1 Q Well, in fact, BellSouth knew its actual system,
2 Encore, couldn't pass the volume test, correct?

3 A (Witness Weeks) I wouldn't be able to say yes or
4 no to that.

5 Q You would agree that BellSouth indicated to you
6 that it's production system could not handle the volume
7 anticipated in these volume tests?

8 A (Witness Weeks) They represented to us that they
9 did not believe that their production system would be able
10 to support those volumes, but I don't know that that was
11 based on empirical evidence. I don't know. You would have
12 to ask BellSouth.

13 Q Do you know any reason why BellSouth couldn't
14 simply have improved their production system to handle the
15 volume tests?

16 A (Witness Weeks) They could have done so. The
17 reasons they gave for doing that were mostly based upon
18 cost.

19 Q They did not want to spend the money it would take
20 to bring their system up to level it would need to be to
21 pass the volume test?

22 A (Witness Weeks) That was the representation that
23 was made to us.

24 Q Now in setting up RSIMMS, BellSouth didn't simply
25 duplicate the Encore system, did it?

ATTACHMENT 60

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1.0 Document Objective

In this document, KPMG Consulting provides a Monthly Status Report on developments related to the BellSouth-FL OSS Testing Project. A brief overview of key developments is provided in section 2.0. Key upcoming activities are summarized in section 3.0. A more detailed report on specific test items from the Master Test Plan is provided in the table in section 4.0. Each item presented in the tables in section 4.0 includes a reference number that identifies the item from a previous status report, where applicable.

2.0 Key Developments

- **Order Management (OM):**

- Interface testing for EDI, TAG, LENS are nearing completion continued through the month of September. Test progress as of September 30th is as follows:
 - TAG – 89 % received Completion Notices
 - EDI – 89% received Completion Notices
 - LENS – 91% received Completion Notices
 - RoboTAG – 51% received Completion Notices
 - Manual – 60% are in Completed Status
- Transaction testing for orders sent via BellSouth's RoboTAG interface resumed in order to monitor date and time stamp issue associated with Observation 91.
- KPMG Consulting continues to monitor all BellSouth systems and representative responses to Local Service Requests (LSRs) as it relates to accuracy and completeness evaluation criteria.
- *TVV1-POP Functional Evaluation.* Preparation activities are underway for a re-test of functionality and timeliness. Exceptions 16, 42, 45, 49, 51, 54, 64, 68, 69, 70, 71, 74, 75, 77, 80, 85, 87, 89, 90, 98, 100, 102, and 105 are open. Observations 49, 64, 77, 81, 87, 89, 90, 91, 92, 93, 95, 99, 100, 104, and 122 also remain open.
- *TVV2-POP Volume Performance Test:* ~~Testing is on hold pending the resolution of open exceptions.~~ Exceptions 99, 104, and 107 are open and are related to ~~electronic volume testing.~~ Exception 72 is open and is related to manual volume testing. Exception 108 has been recommended for closure. KPMG Consulting is refreshing the volume forecast to reflect a September 2002 target date. ~~Exceptions 72, 99, 104, and 107 are open.~~
- *TVV3-Flow-Through Evaluation.* KPMG Consulting is awaiting BellSouth responses to clarification questions on Exception 86 and Observation 94 KPMG

Consulting is preparing to monitor flow-through performance against documentation and benchmarks during the *TVV1-POP Functional Evaluation* re-test. Exception 86 and Observation 94 remain open.

- *PPR7-POP Manual Order Processing Evaluation:* KPMG Consulting continues to monitor and analyze TVV1-POP Functional Evaluation testing activities. Observations and interviews relating to this review were conducted at the Local Carrier Service Centers (LCSC) in Atlanta, Birmingham, and Jacksonville. Additional interviews and observations were conducted at BellSouth's retail centers including the Business Sales Account Center (BSAC), Major Account Center (MAC), Mid-Market Account Center, and the Retail Business Office.
- *PPR8-POP Work Center Help Desk Support:* KPMG Consulting requested and received, in September 2001, updated internal Methods and Procedure guides from BellSouth's Corporate Directory Information Access (CDIA) system. These documents are currently being reviewed and analyzed to refresh test results and address Observation and Exception issues. Exceptions 57, 94, 103, and 110 as well as Observations 109, 111, and 114 are open.
- Analysis also continues on the parity study for *PPR7-POP Manual Order Processing Evaluation* and *PPR8 Work Center Support Evaluation*. Additional interviews and observations may be conducted as the test progresses to address Observation and Exception issues as they arise until closure of the test.
- **Repair, Provisioning and Maintenance (RPM):**
 - *TVV4-Provisioning Verification and Validation:* KPMG Consulting continues with validation testing of Switch Translations, CSR's, Completion Notices, and Directory Listings. Planning continued this month for the Intercept Messaging re-test. Loop Qualification, Line Splitting, and Dark Fiber testing continued through the month of September. Observations 45, 82, 106, 117 and Exceptions 76, 82, 84, and 112 are open.
 - *TVV5-M&R TAFI Functional Evaluation:* KPMG Consulting has completed this test. The final report is complete and in internal review.
 - *TVV6-M&R ECTA Functional Evaluation:* KPMG Consulting continued planning for a re-test of MLT observations for the month of September. Observations 83 and 102 are open.
 - *TVV7-M&R TAFI Performance Evaluation:* KPMG Consulting has completed this test. The final report is complete and in internal review.

- *TVV8-M&R ECTA Performance Evaluation:* KPMG Consulting will continue volume testing with new BellSouth forecasting data. Planning for the volume test continued during the month of September. Observation 107 and Exceptions 38 and 63 are open.
 - *TVV9-M&R End-to-End Trouble Report Processing:* KPMG Consulting has completed this test. The final report is complete and in internal review.
 - *PPR6-Collocation and Network Design Verification and Validation:* KPMG Consulting continues to monitor the Collocation Process. KPMG Consulting is preparing work papers and the final report.
 - *PPR9-Provisioning Process Evaluation:* KPMG Consulting has completed this test. The final report is complete and in internal review.
 - *PPR14-End to End M&R Process:* KPMG Consulting continued preparing for a re-test to satisfy Exception 35. Exception 35 remains open.
 - *PPR15-M&R Work Center Support:* KPMG Consulting has completed this test. The final report is complete and in internal review.
 - *PPR16-Network Surveillance Support:* KPMG Consulting has completed this test. The final report is complete and in internal review.
- **Billing**
 - *TVV10-Billing Functional Usage Evaluation:* KPMG Consulting has completed the DUF retest field work and DUF analysis for Exceptions and Observations. KPMG Consulting is preparing for an additional billing retest, scheduled for late 2001, in conjunction with BellSouth billing infrastructure changes. Exception 13 (Amended), 79, and 83 are open.
 - *TVV11-Functional Carrier Bill Evaluation:* KPMG Consulting has completed the process of analyzing usage records generated from *TVV10-Billing Functional Usage Evaluation* and analyzed under *TVV11-Functional Carrier Bill Evaluation*. KPMG Consulting has validated 95% of all test cases for Bill Period 2. a retest of TVV10 and TVV11 will be conducted in conjunction with BellSouth billing infrastructure changes. Exceptions 43 (Amended), 62, 96 (Amended), and 111 are open.
 - *PPR13-Bill Production and Distribution Process Evaluation:* KPMG Consulting has completed the Parity Evaluation Report.

- **Performance Results Comparison (Metrics):**

- *PMR1-Data Collection and Storage:* KPMG Consulting continued an assessment of systems to be reviewed for the new SQMs and continued to review documentation to validate that current data collection and storage procedures applied to the new SQMs. No open Observations or Exceptions.
- *PMR2-Metrics Definitions and Standards:* KPMG Consulting continued evaluating SQMs defined in the Florida Revised Interim Metrics (SQM document, adopted by the Florida Public Service Commission in November, 2000) and continued evaluating the new proposed SQMs. Observations 69, 112, and Exception 81 are open.
- *PMR3-Change Management:* KPMG Consulting continued to review the Change Management Process and continued to monitor change management adherence. Observation 73 and 118 are open. Exception 78 was closed.
- *PMR 4-Data Integrity:* KPMG Consulting continued the completeness and accuracy phases for all domains and continued the Data Integrity testing for the Test CLEC. Exception 36 is open as part of PMR 4.
- *PMR5-Metrics Calculation:* KPMG Consulting continued to validate SQM calculations for CLEC Aggregate and BellSouth Retail reports as part of test activities, and continued replication of regional metrics and new metrics (added since October 2000) to be tested. Observations 68, 105, 113, 119 and Exceptions 10, 22, 27, 101 and 109 are open for PMR5. Observation 110 was closed and the issue escalated to an Exception (109).

- **Relationship Management Infrastructure (RMI):**

- *PPR1-Change Management Process Verification and Validation Review:* KPMG Consulting attended the BellSouth Change Control Process Status Meeting (9/26/01) for September. KPMG Consulting will continue to observe change management interaction between BellSouth and the CLEC community. In addition, KPMG Consulting continues to await closure of Exception 81 before beginning a second retest for Exception 12. KPMG Consulting has also reviewed BellSouth responses to Observation 116 and Exception 106. KPMG Consulting is in the process of scheduling refresh interviews.
- *PPR2-Account Establishment and Management Review:* KPMG Consulting continues to monitor Account Establishment and Management processes and documentation. This included review of documentation for Exception 65 and 67

and KPMG Consulting has recommended closure of both. KPMG Consulting reviewed the BellSouth response to Observation 115 and is conducting a retest. KPMG Consulting is in the process of scheduling refresh interviews.

- *PPR3-Interface Help Desk Functional Review:* KPMG Consulting continues the review of the EC Support Help Desk Log. KPMG Consulting has issued a data request for the EC Support Help Desk data.
- *PPR4-CLEC Training Verification and Validation Review:* KPMG Consulting has drafted the Final Report for CLEC Training (PPR4). KPMG Consulting is currently in the process of scheduling refresh interviews.
- *PPR5-Interface Development:* KPMG Consulting is monitoring the development of the CLEC Applications Verification Environment (CAVE) for. KPMG Consulting will be testing CAVE with volunteer vendors, service bureaus, and CLECs. BellSouth announced the CAVE would not be available from September 25 until December 10. KPMG Consulting conducted interviews with two CLECs regarding their CAVE testing efforts. KPMG Consulting is reviewing the documentation and process for CLEC CAVE support. Monitoring of the BellSouth Release Management Process continues. Upcoming activities include a review of the BellSouth upgrade procedures related to the Test CLEC TAG upgrade to 7.6.2.1. KPMG Consulting is reviewing the BellSouth third amended response for Exception 6.

- **External Relations:**

- KPMG Consulting issued 3 Observations (119 total to date) and 2 Exceptions (110 total to date). There are currently 41 open Observations and 64 open Exceptions.
- The chart below details Observations and Exceptions by domain.

Domain	Exceptions issued this month	Observations Issued this month	Total Exceptions Issued	Total Observations Issued	Open Exceptions	Open Observations
OM	0	2	54	39	33	22
RPM	1	0	9	24	6	7
Billing	0	0	13	8	10	2
RMI	0	0	19	10	7	3
Metrics	1	1	15	37	8	7
Total	2	3	110	119	64	41

- The next Florida Face to Face is scheduled to take place in Tallahassee, Florida on October 10th. The Face to Face will be held at the FPSC offices at 2540 Shumard Oak Blvd, Tallahassee, Florida in Room 152 of the Fasley Building.

3.0 Key Upcoming Activities

- **TVV1 functional and timeliness re-test.**
- **TVV2 Volume Testing**
- **TVV8 Volume Testing (ECTA)**
- **Second DUF Retest**
- **Refresh of PPR12 (DUF) Process Interviews**
- **Process test refresh (all domains)**

4.0 Master Test Plan Specific Item Status

Domain	Ref	Item	Status	Issues	Observations/ Exceptions	Next Step/Resolution
Order Management	VI-1	<i>TVV1: POP Functional Evaluation</i>	<ul style="list-style-type: none"> Complete functional testing for all interfaces, TAG, EDI, LENS, and RoboTAG. Percent instances in Completion Notice (CN) status as of 9/30 is as follows: EDI 89%, TAG 89%, LENS 91%, RoboTAG 51%. Testing of Complex and Non-Complex orders via facsimile and e-mails has progressed to 60% of planned instances in Completed Status (CP). Preparatory activates continue for TVV-1 re-test. 	<ul style="list-style-type: none"> Notification and Test CLEC Listener problems associated with the TAG interface. 	<ul style="list-style-type: none"> Observations 49, 64, 65, 74, 77, 81, 87, 89, 90, 91, 92, 93, 95, 99, 100, 104, 108 Exceptions 16, 41, 42, 45, 49, 51, 54, 64, 68, 69, 70, 71, 74, 75, 77, 80, 85, 89, 90, 98, 100, 102, 105, 107 	
	VI-2	<i>TVV2: POP Volume Performance</i>	<ul style="list-style-type: none"> The volume forecast is being refreshed to a September 2002 target date. Electronic volume testing is on hold pending resolution of Exceptions 99, 104, 107, and 108. Manual volume testing is on hold pending the resolution of Exception 72. 		<ul style="list-style-type: none"> Exceptions 72, 99, 104, 107, 108 (closing) 	<ul style="list-style-type: none"> Electronic and manual volume testing on hold pending resolution of Exceptions.

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Domain	Ref	Item	Status	Issues	Observations/ Exceptions	Next Step/Resolution
	VII-1	<i>TVV3: Flow Through Evaluation</i>	<ul style="list-style-type: none"> Received monthly raw data reports from BellSouth. Validation of monthly reports against test CLEC data continues. Preparing to monitor flow-through performance during TVV1 re-test. 		<ul style="list-style-type: none"> Exception 86 Observation 94 	
	XIII-1	<i>PPR7: Manual Order Process</i>	<ul style="list-style-type: none"> Parity analysis for PPR7 continues. Received updated Method and procedure documentation, which are currently under review. Final report and work paper preparation continues. Final report will remain in draft until completion of TVV1 test. 		<ul style="list-style-type: none"> Observation 114 Exception: 94 (closure recommendation issued) 	<ul style="list-style-type: none"> KPMG Consulting will continue to monitor and observe TVV manual order process interactions throughout production testing. Request interviews at ordering center to refresh findings.
	XIII-2	<i>PPR8: Work Center Support Evaluation</i>	<ul style="list-style-type: none"> Received updated Method and procedure documentation, which are currently under review. Final report and work paper preparation continues. Final report will remain in draft until completion of TVV1 test. 		<ul style="list-style-type: none"> Observation 109, 111 Exception 57, 94, 103 	<ul style="list-style-type: none"> KPMG Consulting will continue to monitor BellSouth's work center support processes throughout production testing. Request interviews at ordering center to refresh findings.

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Domain	Ref	Item	Status	Issues	Observations/ Exceptions	Next Step/Resolution
Repair, Provisioning, and Maintenance	III-3	<i>Data Requests</i>	<ul style="list-style-type: none"> Interviews and Documentation request will continue related to PPR6, Collocation and OLNS testing as well as for TVV4, Dark Fiber, Line Splitting and Switch Translation testing. Re-Testing to resolve Observations and Exceptions continues. 		TVV4 Observations: 45, 82, 106, 117 Exceptions: 76, 82, 84, 112 TVV6 Observation: 83, 102 TVV8 Observation: 107 Exception: 38, 63 PPR14 Exception: 35	<ul style="list-style-type: none"> Interviews, Documentation, and Data requests continue to be scheduled with BellSouth.
	V-5	<i>CLEC Participation</i>	<ul style="list-style-type: none"> KPMG Consulting is continuing to conduct CLEC discussions for all tests as required. MLT observations and collocation process monitoring as well as OLNS process monitoring continued with CLEC's. 			<ul style="list-style-type: none"> KPMG Consulting will utilize information gained in these discussions to facilitate completion of all tests.
	V-5	<i>CLEC Participation</i>	<ul style="list-style-type: none"> KPMG Consulting is continuing to conduct CLEC discussions for all tests as required. MLT observations and collocation process monitoring as well as OLNS process monitoring continued with CLEC's. 			<ul style="list-style-type: none"> KPMG Consulting will utilize information gained in these discussions to facilitate completion of all tests.

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Domain	Ref	Item	Status	Issues	Observations/ Exceptions	Next Step/Resolution
Billing	X-1	<i>TVV19: Billing Functional Usage Evaluation</i>	<ul style="list-style-type: none"> KPMG Consulting has completed DUF retest analysis. 		<ul style="list-style-type: none"> Exceptions (Amended) 13, 79 & 83 	<ul style="list-style-type: none"> Prepare for second DUF retest.
	XII-2	<i>TVV11: Functional Carrier Bill Evaluation</i>	<ul style="list-style-type: none"> KPMG Consulting has completed all resale usage analysis related to the DUF retest. 		<ul style="list-style-type: none"> Exceptions 43 (Amended), 44 (Amended), 96 (Amended) & 111 	<ul style="list-style-type: none"> Continue Exception 44 UNE validation work with BellSouth.
		<i>PPR10: Billing Work Center/Help Desk</i>	<ul style="list-style-type: none"> KPMG Consulting received the workforce management interview summary report draft with BellSouth's comments. KPMG Consulting continues to work on the initial draft of the PPR10 Final Report. 		<ul style="list-style-type: none"> Exception 37 	<ul style="list-style-type: none"> KPMG Consulting will submit the workforce management interview summary report for BellSouth's comments and approval.
		<i>PPR12: Daily Usage Production & Distribution – Process Evaluation</i>	<ul style="list-style-type: none"> KPMG Consulting has completed initial work on the 1st draft of the draft final report. 			<ul style="list-style-type: none"> Refresh Interviews with BellSouth SMEs.

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Domain	Ref	Item	Status	Issues	Observations/ Exceptions	Next Step/Resolution
		<i>PPR13: Bill Production and Distribution Process Evaluation</i>	<ul style="list-style-type: none"> KPMG Consulting continues to work on the initial draft of the final report. 			<ul style="list-style-type: none"> KPMG Consulting will complete the initial draft of the final report and submit the draft for PM team review.
Metrics	IV-4	Data Requests	<ul style="list-style-type: none"> KPMG Consulting and BellSouth have continued to discuss data requests for the PMR tests, with FPSC participation. 			
	VII-2	<i>PMR1: Data Collection and Storage</i>	<ul style="list-style-type: none"> KPMG Consulting is continuing to review systems related to new metrics. 			
	VII-3	<i>PMR2: Metrics Definitions and Standards</i>	<ul style="list-style-type: none"> KPMG Consulting continues to evaluate SQMs defined in the <i>Florida Revised Interim Metrics</i> (SQM document, adopted by FPSC 06/01) for PMR2. KPMG Consulting continued to analyze data received as part of the Parity By Design Interviews conducted during August. 		<ul style="list-style-type: none"> Observations 69, 112 Exception 81 	<ul style="list-style-type: none"> KPMG Consulting will conduct follow-up interviews as necessary for PMR2.
	VII-4	<i>PMR3: Metrics Change Management</i>	<ul style="list-style-type: none"> KPMG Consulting Continued to monitor adherence to the Change Management Process. 		<ul style="list-style-type: none"> Observations 73, 118 	<ul style="list-style-type: none"> KPMG Consulting will conduct follow-up interviews as necessary for PMR3.

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Domain	Ref	Item	Status	Issues	Observations/ Exceptions	Next Step/Resolution
	VII-5	<i>PMR4 Metrics Data Integrity</i>	<ul style="list-style-type: none"> KPMG Consulting continued the completeness phase analysis for all Domains. KPMG Consulting continued the accuracy phase analysis for all Domains. KPMG Consulting continued the Metric Specific analysis for the all Domains. KPMG Consulting continued the Test CLEC data integrity analysis between KPMG systems and BellSouth's Legacy Systems. 	<ul style="list-style-type: none"> Issues related to Product IDs continue to impact project schedule. 	<ul style="list-style-type: none"> Exception 36 	<ul style="list-style-type: none"> KPMG Consulting will continue to extract data in support of the data integrity comparisons.
	VII-6	<i>PMR5: Metrics Calculations</i>	<ul style="list-style-type: none"> KPMG Consulting continued to validate SQM calculations for CLEC Aggregate and BellSouth Retail reports as part of <i>PMR5: Metrics Calculation</i> test activities, and continued replication of regional metrics and new metrics (added since October 2000) to be tested. KPMG Consulting continued to validate the SQM calculations for the new metrics and the new levels of disaggregations included in the new Interim Metrics. 		<ul style="list-style-type: none"> Observations 68, 105, 113, 119 Exceptions 10, 22, 27, 101, 109 	<ul style="list-style-type: none"> KPMG Consulting will continue to analyze variances in support of the data replication effort.

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Domain	Ref	Item	Status	Issues	Observations/ Exceptions	Next Step/Resolution
Relationship Management Infrastructure	III-1	Data Requests	<ul style="list-style-type: none"> KPMG Consulting has issued a data request related to PPR2 Exc. 95. This document request is to further understand how the Account Team resolves metrics issues. KPMG Consulting has issued a data request for the PPR3 test. This request is for data from the EC Support log of troubles. 			<ul style="list-style-type: none"> KPMG Consulting expects to receive the Exc. 95 documentation on 10/3/01. KPMG Consulting expects to receive the PPR3 data on 10/3/01.
	IV-2	<i>PPR1: Change Management Practices Verification and Validation Review</i>	<ul style="list-style-type: none"> KPMG Consulting attended the BellSouth Change Control Process Status Meeting 9/26/01. KPMG Consulting Continues to monitor the Change Management Process. KPMG Consulting reviewed responses to Observation 116 and Exception 106. KPMG Consulting has begun scheduling refresh interviews. 	<ul style="list-style-type: none"> KPMG Consulting has reviewed the BellSouth response to Amended Exception 12 and is awaiting closure of Exception 81 before the second retest begins. 	<ul style="list-style-type: none"> Exceptions 12, 88, and 106 Observations 86, and 116 	<ul style="list-style-type: none"> KPMG Consulting will continue to observe change management interaction between BellSouth and the CLEC community. KPMG Consulting will prepare for the Exception 12 Second retest. KPMG Consulting will attend the Change Control Process Monthly Status Meeting as well as the process improvement meeting for October.

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Domain	Ref	Item	Status	Issues	Observations/ Exceptions	Next Step/Resolution
	XI-1	<i>PPR2: Account Management</i>	<ul style="list-style-type: none"> KPMG Consulting continued to review BellSouth Responses to Exception 65 and 67 and has recommended disposition for both. KPMG Consulting is retesting Observation 115. KPMG Consulting has begun scheduling refresh interviews. 		<ul style="list-style-type: none"> Exceptions 65, 67, 95 Observation 115 	<ul style="list-style-type: none"> KPMG Consulting will continue to review documentation associated with Account Management and Establishment.
	XI-2	<i>PPR3: OSS Interface Help Desk</i>	<ul style="list-style-type: none"> KPMG Consulting continued to review the EC Support Help Desk Log. 	<ul style="list-style-type: none"> KPMG Consulting has reviewed the BellSouth response to Amended Exception 12 and is awaiting BellSouth's implementation of a new email system as well as the closure of Exception 81 before the second retest begins. 		<ul style="list-style-type: none"> KPMG Consulting will continue to review the EC Support Help Desk Log. KPMG Consulting will review the ECS Help Desk data received.
	XII-1	<i>PPR4: CLEC Training</i>	<ul style="list-style-type: none"> KPMG Consulting has begun scheduling refresh interviews. 			<ul style="list-style-type: none"> No scheduled activity.

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Domain	Ref	Item	Status	Issues	Observations/ Exceptions	Next Step/Resolution
		<i>PPR5-OSS Interface Development</i>	<ul style="list-style-type: none"> Continue review of Interface development process documentation. Additional Documentation was received. Continued to Monitor development of BellSouth CLEC test environment (CAVE). Continued to Monitor the BellSouth Release management process. Exceptions and 20 closed. Observation 53 closed. 		<ul style="list-style-type: none"> Exceptions 6 	<ul style="list-style-type: none"> Observe CAVE testing process. Observed CAVE Connectivity, syntax and application testing for one Vendor/CLEC. Held interviews regarding CAVE with three vendors/CLECs.
External Relations (CLEC Contact, Exceptions/ Observations, Status Reporting)	I-18	<i>Exception/ Observation Process</i>	<ul style="list-style-type: none"> KPMG Consulting issued 3 Observations (119 total to date) and 2 Exceptions (110 total to date). There are currently 41 open Observations and 64 open Exceptions. 	<ul style="list-style-type: none"> Observation calls are held following the Wednesday 10AM status calls at approximately 11:00 AM. Exception calls are held on Thursdays at 1:30PM with the same conference bridge and pass code. 		
	IV-I-19	<i>CLEC Face to Face</i>	<ul style="list-style-type: none"> Next Meeting to be held in Tallahassee, Florida on October 10, 2001. 			

¹ Referencing Methodology: An item referenced as I-n indicates that this item first appeared in the March 7, 2000 report. An item referenced as II-n indicates that this item first appeared in the April 7, 2000 report. An item referenced as III-n indicates that this item first appeared in the May 5, 2000 report. An item referenced as IV-n indicates that this item first appeared in the June 7, 2000 report. An item referenced as V-n indicates that this item first appeared in the July 10, 2000 report. An item referenced as VI-n indicates that this item first appeared in the August 7, 2000 report. An item referenced as VII-n indicates that this item first appeared in the September 7, 2000 report. An item referenced as VIII-n indicates that this item first appeared in the October 6, 2000 report. An item referenced as IX-n indicates that this item first appeared in the November 7, 2000 report. An item referenced as X-n indicates that this item first appeared in the December 7, 2000 report. An item referenced as XI-n indicates that this item first appeared in the January 8, 2001 report. An item referenced as XII-n indicates that this item first appeared in the February 7, 2001 report. An item referenced as XIII-n indicates that this item is new for this report.

Attachment 3

DATE: September 12, 2001
TO: William D. Talbott, Executive Director
FROM: Division of Regulatory Oversight (Hoppe, Harvey)
Division of Competitive Services (D'Hasseler, Simmons)
Division of Legal Services (B. Keating)
RE: Florida Third-Party Testing of BellSouth's Operational Support Systems (OSS)

CRITICAL INFORMATION: Please place on the September 18, 2001 Internal Affairs

During the September 18, 2001 Internal Affairs, staff and KPMG would like to provide a short briefing on the status of BellSouth OSS third-party testing. Attached is a handout detailing the status of evaluation criteria, observations and exceptions.

LSH/bjm

Attachment

cc: Dan Hoppe
Walter D'Hasseler
Bill Lowe
Beth Salak
Beth Keating
Sally Simmons

**Florida OSS Testing of BellSouth
Status of Evaluation Criteria
as of September 12, 2001**

Domain/Test	Total Evaluation Criteria	Total Eval Criteria Currently Passing	Total Eval Criteria Currently Failing/ Retesting	Total Eval Criteria Under Evaluation	Percent Currently Passing	Percent Currently Fail/ Retesting	Percent Currently Under Evaluation
PMR1 Data Collection	48	24	0	24	50%	0%	50%
PMR2 Metric Definitions	574	562	12	0	98%	2%	0%
PMR3 Metric Change Mgt	7	0	4	3	0%	57%	43%
PMR4 Data Integrity	140	40	0	100	29%	0%	71%
PMR5 Metric Calculations	328	303	9	16	92%	3%	5%
TVV4 Provisioning Verification	23	0	0	23	0%	0%	100%
TVV5 TAFI Functional	16	16	0	0	100%	0%	0%
TVV6 ECTA Functional	14	11	0	3	79%	0%	21%
TVV7 TAFI Performance	9	9	0	0	100%	0%	0%
TVV8 ECTA Performance	20	10	10	0	50%	50%	0%
TVV9 End-to-End Trouble Rpt	35	35	0	0	100%	0%	0%
PPR6 Collocation	17	17	0	0	100%	0%	0%
PPR9 Provisioning Process	82	66	0	16	80%	0%	20%
PPR14 End-to-End M&R	16	15	1	0	93.75%	6.25%	0%
PPR15 M&R Work Centers	19	19	0	0	100%	0%	0%
PPR16 Network Surveillance	6	6	0	0	100%	0%	0%
PPR1 Change Management	8	2	5	1	25%	62.5%	12.5%
PPR2 Account Establishment	17	8	1	8	47%	6%	47%
PPR3 Interface Help Desk	13	2	5	6	15%	39%	46%
PPR4 CLBC Training	14	14	0	0	100%	0	0
PPR5 Interface Development	23	5	1	17	22%	4%	74%
TVV1 POP Functional	100	0	30	70	0%	30%	70%
TVV2 POP Volume	37	0	13	24	0%	35%	65%
TVV3 Flow Through	20	0	4	16	0%	20%	80%
PPR7 POP Manual Ordering	14	12	1	1	86%	7%	7%
PPR8 POP Work Center	21	13	2	6	62%	9.5%	28.5%
TVV10 Billing Functional	6	4	2	0	66.6%	33.4%	0%
TVV11 Carrier Bill Evaluation	20	13	3	4	65%	15%	20%
PPR10 Billing Work Center	19	18	1	0	95%	5%	0%
PPR12 Daily Usage Production	16	16	0	0	100%	0%	0%
PPR13 Bill Production	44	43	1	0	98%	0	2%

**Florida OSS Testing of BellSouth
Status of Observations and Exceptions
as of September 12, 2001**

OSS Observations			
	Total	Open	Closed
Performance Metrics	36	6	30
Repair, Provisioning and Maintenance	24	7	17
Relationship Management Infrastructure	10	3	7
Order Management	38	20	18
Billing	8	2	6
Total	136	58	78

Observations are potential deficiencies in BellSouth's OSS or a defect that hinders test execution.

OSS Exceptions			
	Total	Open	Closed
Performance Metrics	14	8	6
Repair, Provisioning & Maintenance	8	6	2
Relationship Management Infrastructure	19	7	12
Order Management	54	33	21
Billing	13	10	3
Total	108	64	44

Exceptions identify a deficiency that may result in a "not satisfied" condition in the final report if not remedied.

			Section Fields			
Added Rule 2: For REQ TYP A, TOS = R; Line Share this field <i>must</i> be populated with "XXXX" (if using <u>existing</u> facilities or FRN from Loop Make Up Query if using <u>reserved</u> facilities.)						
Added Rule 3: For REQ TYP A-TOS = P; Line Splitting this field <i>must</i> be populated with "XXXX" (if using <u>existing</u> facilities or FRN from Loop Make Up Query if using <u>reserved</u> facilities.)						
2754 CCP- 0441	N/A	Data Element Dictionary	LSR - Administra tive Section Fields	REMARKS	-	Added CONDITIONAL USAGE NOTES:
Note 1: On REQ TYP A where TOS 2 nd character =R and the splitter resides inside the DLEC cage (Splitter LOC I), populate this field with CTI=B.						
Note 2: On REQ TYP A where TOS 2 nd character =R and the splitter resides inside the DLEC cage (Splitter LOC I), populate this field with CABLE ID2. (DLEC Collocated Cable ID- indicates CA for voice only cross connect).						
Note 3: On REQ TYP A where TOS 2 nd character =R and the splitter resides inside the DLEC cage (Splitter LOC I), populate with CHAN/PR2 (DLEC Collocated Cable ID-indicates CA for voice only cross connect).						
Note 4: On REQ TYP A where TOS 2 nd character =R and the splitter resides inside the DLEC cage (Splitter LOC I), populate this field with RESID=FRN.						
2754 CCP- 0441	N/A	Data Element Dictionary	LSR - Administra tive Section Fields	REMARKS	-	Added BUSINESS RULES:
Rule 5: On REQ TYP A where TOS 2 nd character =P and the splitter resides inside the DLEC cage (Splitter LOC I), populate this field with CTI=B.						
Rule 6: On REQ TYP A where TOS 2 nd character =P and the splitter resides inside the DLEC cage (Splitter LOC I), populate this field with CABLE ID2. (DLEC Collocated Cable ID- indicates CA for voice only cross connect).						
Rule 7: On REQ TYP A where TOS 2 nd character =P and the splitter resides inside the DLEC cage (Splitter LOC I), populate with CHAN/PR2 (DLEC Collocated Cable ID-indicates CA for voice only cross connect).						
Rule 8: On REQ TYP A where TOS 2 nd character =P and the splitter resides inside the DLEC cage (Splitter LOC I), populate this field with RESID=FRN.						
Rule 9: For REQ TYP A, TOS = R; Line Share this field <i>must</i> be populated with "XXXX" (if using <u>existing</u> facilities or FRN from Loop Make Up Query if using <u>reserved</u> facilities.)						
Rule 10: For REQ TYP A-TOS = P; Line Splitting this field <i>must</i> be populated with "XXXX" (if using <u>existing</u> facilities or FRN from Loop Make Up Query if using <u>reserved</u> facilities.)						
Rule 11: For REQ TYP A, TOS = R; HFS Unbundled (CO Based) Line Share DLEC Owned this field <i>must</i> be populated with CTI=B cable ID2 XXXX1 and CHAN/PAIR2-XXXX.						
Rule 12: For REQ TYP A-TOS = P; Line Splitting this field <i>must</i> be populated with CTI=B cable ID2 XXXX1 and CHAN/PAIR2-XXXX.						
2857 CCP- 0474	N/A	Data Element Dictionary	LSR - Administrati ve Section Fields	REQ TYP	Valid Entries	Added (BellSouth®) to Centrex® and added ESSX® AND MultiServ® for REQ TYP P (row).
2873	N/A	Data	LSR -	TOS	-	Added BUSINESS

**Attachment
SN91082639**

		Element Dictionary	Administrative Section Fields			RULE: Rule 12: When both PBX and DID Trunks are on the same request, the second character of the TOS should be "J".
2882	N/A	Data Element Dictionary	LSR - Administrative Section Fields	TOS	–	Added (SynchroNet®) valid 2 nd character TOS for ACT N, C, D, T, V and W
2885	N/A	Data Element Dictionary	LSR - Administrative Section Fields	REMARKS	–	Added BUSINESS RULES 'Rule 4: When ordering RS HFS Unbundled Line Share DLEC Owned this field must be populated as follows: REMARKS Remote Site DLEC Owned Requested.'
2889	N/A	Data Element Dictionary	Introduction	–	–	Added verbiage regarding fields that are not supported by BellSouth. "Not Supported is defined as this field is not used by BellSouth and when populated will be ignored by BellSouth. The Not Supported fields will not be shown in the R/C/O tables, but will be reflected in the Data Elements Dictionary."
2894	N/A	Data Element Dictionary	LSR - Administrative Section Fields	–	–	Update to change Centrex to BellSouth Centrex, and to add ESSX, and MultiServ to the table for REQTYPE
2899	N/A	Data Element Dictionary	RS - Administrative Section Fields	LNUM	–	Update 5 digit EXAMPLE.
2899	N/A	Data Element Dictionary	RS - Administrative Section Fields	RSQTY	–	Update Valid Entry to show 000-999

ATTACHMENT 61

DECLARATION OF JAY M. BRADBURY

EXCEPTION 99

BellSouth Florida OSS Testing Evaluation

Date: August 23, 2001

EXCEPTION REPORT

KPMG Consulting has identified an exception as a result of the POP Volume Performance Test (TVV-2).

Exception:

KPMG Consulting has not received fully mechanized responses to multiple Local Service Requests (LSRs) submitted to BellSouth's Electronic Data Interchange (EDI) interface. (TVV2)

Background:

BellSouth's Business Rules for Local Ordering specifies: "A FOC will be returned to the Competitive Local Exchange Carrier (CLEC) via facsimile or electronically after the Local Carrier Service Center (LCSC) processes the CLEC's service request(s) and determines that corrections or error resolutions are not required."¹

BellSouth is expected to provide fully mechanized Firm Order Confirmations (FOCs), Clarification, or Error responses for a minimum of 99% of acknowledged PONs.² Planned flow-through drop-out errors are excluded from the calculation.

Issue:

As part of the POP Volume Performance Test KPMG Consulting submitted orders to BellSouth via EDI on August 18, 2001.

The following are the response results on mechanized orders using the EDI interface, excluding planned flow-through drop-out orders.

ACK	FOC, ERR, or CLR	No Response	Response Percentage
8743	7989	754	91.4%

KPMG Consulting has not received a fully mechanized FOC, rejection, or clarification from BellSouth for the following orders³:

¹ BellSouth Business Rules for Local Ordering, Issue 90, section 2.9.3.

² KPMG Consulting applied standards based on its professional judgment in the absence of 1) FPSC-approved standards or 2) documented BLS guidelines.

³ A representative sample of the 754 PONs has been provided.

EXCEPTION 99

BellSouth Florida OSS Testing Evaluation

PON	Ver	CC
0021211CEJYY0256	00	9991
0021211CEJYY0482	00	9991
0200211CENYY0001	00	9991
0200211CENYY0002	00	9991
0200511CEJYY0015	00	9991
0200511CEJYY0026	00	9991
0200511CEJYY0049	00	9991
0200511CEJYY0074	00	9991
0200511CEJYY0140	00	9991
0200511CEJYY0194	00	9991
0200511CEJYY0214	00	9991
0200511CEJYY0240	00	9991
0200511CEJYY0280	00	9991
0200511CEJYY0370	00	9991
0200511CEJYY0502	00	9991
0700221CEHYY0021	00	9991
0700221CEHYY0097	00	9991
0700221CEHYY0215	00	9991
0720621CEHYY0018	00	9991
0720621CEHYY0033	00	9991
0720621CEHYY0061	00	9991

EXCEPTION 99
BellSouth Florida OSS Testing Evaluation

PON	Ver	CC
0720621CEHYY0081	00	9991
0720621CEHYY0141	00	9991
0720621CEHYY0153	00	9991
0720621CEHYY0168	00	9991
0720621CEHYY0188	00	9991
0720621CEHYY0204	00	9991
0760121CEHYY0057	00	9991
0760121CEHYY0148	00	9991
0760121CEHYY0188	00	9991

Impact:

The absence of fully mechanized BellSouth confirmations and errors can create extra work for a CLEC to follow up on missing responses, have a negative impact on the timeliness of order completion, and may lower overall CLEC customer satisfaction.

EXCEPTION 107

BellSouth Florida OSS Testing Evaluation

Date: August 29, 2001

EXCEPTION REPORT

KPMG Consulting has identified an exception as a result of the Volume Performance Test (TVV-2).

Exception:

KPMG Consulting has not received fully mechanized responses to multiple Local Service Requests (LSRs) submitted to BellSouth's Telecommunications Access Gateway (TAG) interface. (TVV2)

Background:

BellSouth's Business Rules for Local Ordering specifies: "A FOC will be returned to the CLEC either via facsimile or electronically after the Local Carrier Service Center (LCSC) processes the CLEC's service request(s) and determines that corrections or error resolutions are not required."¹

BellSouth is expected to provide fully mechanized FOC, Clarification, or Error responses for at least 99% of acknowledged PONs.² Planned flow-through drop-out errors are excluded from the calculation.

Issue:

As part of the Volume Performance Test KPMG Consulting submitted orders to BellSouth via the TAG interface on August 18, 2001.

Response results on mechanized orders excluding planned flow-through drop-out orders are as follows:

ACK	FOC, ERR, or CLR	No Response	Response Percentage
91	88	3	96.7%

KPMG Consulting has not received a fully mechanized FOC, rejection, or clarification from BellSouth for the following orders:

¹ BellSouth Business Rules for Local Ordering, Issue 90, section 2.9.3.

² KPMG Consulting applied a benchmark of "99% Returned" to Ordering Measure O-11 of the BellSouth OSS Testing Florida Interim Performance Metrics Version 3.0, Approved June 1, 2001. The benchmark was applied based on KPMG Consulting's professional judgment.

EXCEPTION 107

BellSouth Florida OSS Testing Evaluation

PON	Ver	CC
0026011CTJYY0001	00	9991
0720621CTHYY0001	00	9991
0720621CTHYY0002	00	9991

Impact:

The absence of fully mechanized BellSouth confirmations and errors can create extra work for a CLEC to follow up on missing responses, have a negative impact on the timeliness of order completion, and may lower overall CLEC customer satisfaction.

EXCEPTION 104

BellSouth Florida OSS Testing Evaluation

Date: August 28, 2001

EXCEPTION REPORT

KPMG Consulting has identified an exception as a result of the POP Volume Performance Test (TVV-2).

Exception:

KPMG Consulting has not received timely responses for the pre-order queries, Appointment Availability (AAQ), Address Validation (AVQ), Address Validation by Telephone Number (AVQ_TN), Customer Service Record (CSRQ), Service Availability (SAQ) and Telephone Number Assignment (TNAQ) submitted via the Robust Telecommunications Access Gateway (RoboTAG) Web interface. (TVV2)

Background:

According to Operations Support Systems OSS-1 of the Service Quality Measurement Plan¹, BellSouth should return pre-order responses within an average interval that is at parity +2 seconds with retail performance provided monthly by BellSouth. KPMG Consulting used BellSouth parity metrics for the report period of June 1, 2001 through June 30, 2001².

Issue:

During volume testing conducted on August 16, KPMG Consulting received the following results for AAQ, AVQ, AVQ_TN, CSRQ, SAQ and TNAQ pre-orders, submitted using RoboTAG:

	<2.3 Seconds	>6 Seconds	<=6.3 Seconds	Average Response Time
AAQ - KPMG Consulting Performance	44.71%	54.68%	45.32%	21.1 Seconds
BellSouth Parity	98.24%	0.64%	99.39%	0.69 Seconds
AVQ - KPMG Consulting Performance	0%	96.97%	3.03%	54.7 Seconds
BellSouth Parity	96.16%	0.71%	99.33%	1.04 Seconds
AVQ_TN - KPMG Consulting	0%	100%	0%	53.4 Seconds

¹ BellSouth OSS Testing Florida Interim Performance Metrics Version 3.0, Approved by Florida PSC June 12, 2001

² Pre-Ordering and Ordering OSS

EXCEPTION 104

BellSouth Florida OSS Testing Evaluation

Performance				
BellSouth Parity	97.37%	0.48%	99.55%	0.92 Seconds
CSRQ - KPMG Consulting Performance	0%	99.58%	0.42%	66.5 Seconds
BellSouth Parity	93.36%	1.60%	98.46%	1.66 Seconds
SAQ - KPMG Consulting Performance	0%	100%	0%	196.1 Seconds
BellSouth Parity	77.21%	4.92%	95.47%	2.09 Seconds
TNAQ - KPMG Consulting Performance	12.30%	79.67%	20.33%	26.9 Seconds
BellSouth Parity	95.50%	2.22%	97.85%	3.12 Seconds

Impact:

Delays in receiving pre-order responses could prevent a CLEC from obtaining information necessary to efficiently process a customer's service request. As a result, customer satisfaction with the CLEC could decrease.

ATTACHMENT 62

DECLARATION OF JAY M. BRADBURY

AMENDED EXCEPTION 72

BellSouth Florida OSS Testing Evaluation

Date: September 25, 2001

EXCEPTION REPORT

KPMG Consulting has identified an exception as a result of the POP Volume Performance Test (TVV-2).

Exception:

KPMG Consulting has not received responses to multiple Local Service Requests (LSRs) submitted to BellSouth via facsimile (fax). (TVV2)

Background:

BellSouth's Business Rules for Local Ordering specifies: "A FOC will be returned to the CLEC either via facsimile or electronically after the Local Carrier Service Center (LCSC) processes the CLEC's service request(s) and determines that corrections or error resolutions are not required."¹

Issue:

As part of the POP Volume Performance Test KPMG Consulting submitted 54 orders to BellSouth's Atlanta LCSC via fax on May 23, 2001. KPMG Consulting submitted 54 additional orders to BellSouth's Atlanta LCSC via fax on May 31, 2001.

KPMG Consulting has not received a FOC, Rejection, or Clarification, via fax on eight (8) of the 54 orders submitted on May 23, and (nine) 9 of the 54 orders submitted on May 31.

We have not received a FOC, rejection, or clarification from BellSouth for the following orders:

PO#	Ver	CC	Date Sent
0020821AMJ110005	00	9990	05/23/01
0020821AMJ110007	00	9990	05/23/01
0021211AMJ110005	00	9990	05/23/01
0021211AMJ110006	00	9990	05/23/01
0021211AMJ110012	00	9990	05/23/01
0021211AMJ110013	00	9990	05/23/01

¹ BellSouth Business Rules for Local Ordering, Issue 9N, section 2.9.3.

AMENDED EXCEPTION 72

BellSouth Florida OSS Testing Evaluation

PON	Ver	CC	Date Sent
0021211AMJ110014	00	9990	05/23/01
0021211AMJ110021	00	9990	05/23/01
0020822AMJ110001	00	9990	05/31/01
0020822AMJ110004	00	9990	05/31/01
0020822AMJ110007	00	9990	05/31/01
0020822AMJ110008	00	9990	05/31/01
0021212AMJ110001	00	9990	05/31/01
0021212AMJ110004	00	9990	05/31/01
0160412AMN110002	00	9993	05/31/01
0720112AMH110005	00	9991	05/31/01
0720112AMH110021	00	9991	05/31/01

Amendment:

BellSouth's response indicated that KPMG Consulting did not receive responses to 12 of the PONs due to LCSC employee errors. In addition, BellSouth stated that four PONs were received in the LCSC, but not tracked and processed. Based on this information, KPMG Consulting initiated a retest.

KPMG Consulting submitted 54 orders via fax on August 28, 2001 to retest BellSouth's Atlanta LCSC. KPMG Consulting has not received a FOC, Rejection, or Clarification via fax on 11 of the 54 orders.

KPMG Consulting has not received a FOC, rejection, or clarification from BellSouth for the following orders:

PON	Ver	CC	Date Sent
0021211BMJ110011	00	9990	08/28/01
0021211BMJ110018	00	9990	08/28/01

AMENDED EXCEPTION 72

BellSouth Florida OSS Testing Evaluation

PON	Ver	CC	Date Sent
0720111BMH110008	00	9991	08/28/01
0720111BMH110011	00	9991	08/28/01
0720111BMH110012	00	9991	08/28/01
0720111BMH110018	00	9991	08/28/01
0720111BMH110019	00	9991	08/28/01
0720111BMH110020	00	9991	08/28/01
0720111BMH110021	00	9991	08/28/01
0720111BMH110022	00	9991	08/28/01
0720111BMH110023	00	9991	08/28/01

Impact:

The absence of BellSouth responses can create extra work for a CLEC to follow up on missing responses, have a negative impact on the timeliness of order completion, and may lower overall CLEC customer satisfaction.

ATTACHMENT 63

DECLARATION OF JAY M. BRADBURY



Paul E. Patton, Governor

Ronald B. McCloud, Secretary
Public Protection and
Regulation Cabinet

Thomas M. Dorman
Executive Director
Public Service Commission

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PUBLIC SERVICE COMMISSION
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Martin J. Hueismann
Chairman

Edward J. Holmes
Vice Chairman

Gary W. Cullis
Commissioner

May 16, 2001

RECEIVED

MAY 21 2001

PSC
FINANCIAL ANALYSIS

PARTIES OF RECORD:

Re: Case No. 2001-105

Attached is a copy of the memorandum which is being filed in the record of the above referenced case. If you have any comments you would like to make regarding the contents of the informal conference memorandum, please do so within five days of receipt of this letter. Should you have any questions, please contact Bonnie Kittinger at 502/564-3940, Extension 238.

Sincerely,

Thomas M. Dorman
Executive Director

Attachment

615-242-6866



AN EQUAL OPPORTUNITY EMPLOYER M/F/D

PUBLIC SERVICE COMMISSION

Case No. 100-119 Main Case File
FROM: Bernier, Daniel
DATE: May 15, 2006
RE: INVESTIGATION CONCERNING THE PROPHETIC PROMISE OF
INTERNET SERVICES BY BELL SOUTH TELECOMMUNICATIONS IN
PURSUANT TO THE TELECOMMUNICATIONS ACT OF 1996

Staff welcomed attendees and announced that the conference was being broadcast over the Commission's web site.

AT&T representative Sharon Norris presented information regarding Third Party Testing in Georgia and Florida. She has been involved in testing in Florida and Georgia since 1999. It is AT&T's position that the Florida testing is much more comprehensive than the testing in Georgia. Ms. Norris' remarks are summarized in a handout entitled "Third Party Testing, Georgia Vs Florida." There were several references to testimony from KPMG representatives and Ms. Norris agreed that she would file the deposition containing those references as part of her presentation.

Jay Bradbury, also from AT&T, presented information regarding BellSouth's Operations Support Systems (OSS). Most of his remarks are summarized in the handout entitled "OSS Ties It Together, Third Party Testing Checks the Knots." Mr. Bradbury noted that the preordering component was excluded from the Price Waterhouse Coopers (PWC) audit; that there are many fallouts from the electronic ordering system; and that provisioning testing in one state is not evidence that a system is working in another state. He urged the Commission to identify and establish Kentucky performance measurements; engage an independent, third party consultant to determine if OSS testing is needed; and conduct such testing if appropriate, or, if third party testing is not necessary in Kentucky, utilize Florida test data and results in formulating an opinion on Section 271 issues.

Next, Fred McCallum, from BellSouth discussed BellSouth's goals and the evidentiary platform on which BellSouth will rely, including the Kansas/Oklahoma "roadmap" to a Section 271 compliance determination. Most of Mr. McCallum's remarks are summarized in the handout "Kentucky Public Service Commission, May 10, 2001, 271 Informal Conference." He prefaced his remarks by stating that BellSouth's goal is to show the Commission that

commercial usage in Kentucky establishes non-discriminatory access, that the Georgia test is a good test, and that the DOE/SONGS system is merely a piece of the whole picture.

According to Mr. McCallum, 18,000-20,000 CLEC orders per month are now being processed through SONGS in Kentucky and this commercial usage is sufficient to establish that non-discriminatory access is being granted to CLECS. Moreover, BellSouth can prove that its OSS are the same throughout the nine-state region.

The FCC 271 Order for Kansas and Oklahoma stated that, if a BOC proves that its OSS function is the same in one state as in other states, the FCC will consider performance in other states as additional evidence with which to make a determination on compliance. According to BellSouth, the PWC audit of BellSouth's OSS is comparable to the Ernst & Young audit in Kansas and Oklahoma. The FCC accepted the Ernst & Young audit as proof that Kansas and Oklahoma systems were the same as SWBT's system in Texas, which had already been granted approval for long distance service under Section 271 of the Act.

Milton McElroy, from BellSouth, discussed "Regionality Testing" using a handout with the same title. He explained that three service centers handle service orders by function and by CLEC assignment in order to evenly distribute the workload. Atlanta and Birmingham service centers process all requests except preordering and ordering issues for their assigned CLECS and the Jacksonville service center handles preordering and ordering issues for all nine states. He emphasized that DOE and SONGS are a small component of the process.

After explaining the purpose of BellSouth's hiring of PWC to audit its assertions regarding OSS, Mr. McElroy introduced Robert Lattimore, Mike Lawley and Ronald Taylor of the accounting firm.

Each of the PWC representatives discussed various aspects of the attestation examination of BellSouth's management assertions concerning its OSS. Their remarks are summarized in a 17-page handout entitled "BellSouth OSS Region-Wide Comparability." The goal of the audit was to look at actual orders to verify the sameness of functionality and performance of DOE and SONGS, and to ensure that no differences occurred based on the end-user state or the CLEC submitting the order.

According to the PWC representatives, members of the audit team actually sat with BellSouth service representatives at each of the three service centers and observed the way the service representatives processed each request. They saw all of the orders that came to the service representative on the day or days they were present. They do not believe that orders were screened or handpicked for their observation.

The PWC audit did not compare the success rate of DOE and SONGS, according to the firm's representatives. The auditors observed that errors could occur down the line, after the initial acceptance by SOCS; however, no success or failure rate was calculated. BellSouth proffered that such errors down the line would not likely be due to any difference in DOE and SONGS.

Commission Staff pointed out that a primary difference in the attestation audit by Ernst & Young in Kansas and Oklahoma and the audit conducted by PWC, is that the OSS throughout SWBT's region is the same and the Ernst & Young audit was able to attest to that; whereas, in BellSouth's region, five states use one software program, SONGS, while four states use DOE. In BellSouth's region, the attestation audit has concluded that these systems have no material differences in functionality or performance.

In response to questions by Commission Staff, PWC representatives stated that they collected data for each transaction they observed at the service centers; however, that data is not included in their report to BellSouth. Instead, it is part of PWC's work papers and is confidential.

BellSouth was asked if it wanted to withdraw a May 8, 2001 request for Staff to reconsider its position regarding the adequacy of the PWC audit as evidence of 271 compliance. BellSouth wanted to know what the Staff's position is with regard to the audit in view of information provided by PWC representatives. Commission Staff expressed interest in reviewing the data collected by PWC, and on which the accounting firm based its report, since that appears to be similar to data that Staff would attempt to obtain through limited third party testing. BellSouth agreed to discuss the matter further in-house and with PWC to see if the background data could be supplied for Staff review.

A representative of COVAD and other CLEC entities expressed concerns regarding the volume of testing of manual orders in Kentucky, preordering, ordering and line sharing requests, XDSL loops, IDSL loops, jeopardy issues such as missed appointments and similar issues, which may not be satisfied by information gleaned in the Georgia testing and PWC audit.

Fred Gerwing assured everyone that, while BellSouth is confident that the FCC will accept the Georgia testing platform, if it does not, BellSouth will back up and use Florida testing as its proof.

This concluded the informal conference. A copy of each handout referenced herein is being filed in the Main Case File.

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

INVESTIGATION CONCERNING THE
PROPRIETY OF INTERLATA SERVICES
BY BELL SOUTH TELECOMMUNICATIONS,
INC., PURSUANT TO THE
TELECOMMUNICATIONS ACT OF 1996

CASE NO. 2001-105

=====

May 10, 2001 Informal Conference

=====

Please sign in:

NAME	REPRESENTING
<u>Amy S. Dougherty</u>	<u>PSC</u>
<u>JEFF JOHNSON</u>	<u>PSC</u>
<u>Bonnie Kettinger</u>	<u>PSC</u>
<u>Sharon Davis</u>	<u>ATT</u>
<u>Carol Wallace</u>	<u>ATT</u>
<u>Jackie Byler</u>	<u>Sprint</u>
<u>Tommy King</u>	<u>Sprint</u>
<u>Jon Hamm</u>	<u>Sprint</u>
<u>Jim Lenihan</u>	<u>Sprint</u>
<u>Kyle B. Wilk</u>	<u>PSC</u>
<u>Eric Bowman</u>	<u>PSC</u>
<u>Jim Stevens</u>	<u>PSC</u>
<u>Bob Amato</u>	<u>PSC</u>

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

INVESTIGATION CONCERNING THE
PROPRIETY OF INTERLATA SERVICES
BY BELL SOUTH TELECOMMUNICATIONS,
INC., PURSUANT TO THE
TELECOMMUNICATIONS ACT OF 1996

CASE NO. 2001-106

=====

May 10, 2001 Informal Conference

=====

Please sign in:

NAME	REPRESENTING
<u>Amanda Hale</u>	<u>PSC</u>
<u>JIM TIPTON</u>	<u>BELL SOUTH</u>
<u>John A. Progress</u>	<u>PSC</u>
<u>Kent Hatfield</u>	<u>McI WorldCom</u>
<u>Conc. Dorman</u>	<u>PSC</u>
<u>Larry Harley</u>	<u>PSC</u>
<u>Phyllis Yarnin</u>	<u>PSC</u>
<u>Edley Roberts</u>	<u>Bell South</u>
<u>Steve Rains</u>	<u>"</u>
<u>MILTON MCELROY</u>	<u>"</u>
<u>Fred McCallum</u>	<u>Bell South</u>
<u>Dorothy Chalk</u>	<u>"</u>
<u>Mike Lowrey</u>	<u>PSC</u>

ATTACHMENT 64

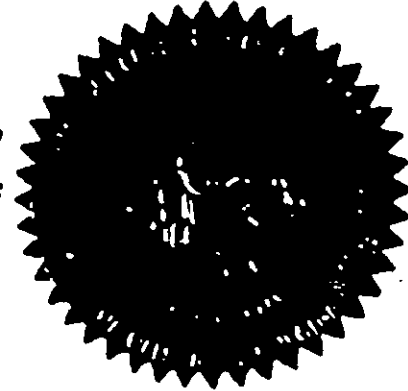
DECLARATION OF JAY M. BRADBURY

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

DOCKET NO. 000731-TP

In the Matter of

**PETITION BY AT&T COMMUNI-
CATIONS OF THE SOUTHERN STATES,
D/B/A AT&T FOR ARBITRATION OF
CERTAIN TERMS AND CONDITIONS OF
A PROPOSED AGREEMENT WITH
BELL SOUTH COMMUNICATIONS, INC.
PURSUANT TO 47 U.S.C.
SECTION 252.**



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AND DO NOT INCLUDE PREFILED TESTIMONY.**

VOLUME 8

PAGES 1099 THROUGH 1253

PROCEEDINGS: HEARING

**BEFORE: CHAIRMAN E. LEON JACOBS, JR.
COMMISSIONER BRAULIO L. BAEZ
COMMISSIONER MICHAEL A. PALECKI**

DATE: Thursday, February 15, 2001

TIME: Commenced at 9:00 a.m.

**PLACE: Betty Easley Conference Center
Room 14B
4075 Esplanade Way
Tallahassee, Florida**

**REPORTED BY: JANE FAUROT, RPR
FPSC Division of Records & Reporting
Chief, Bureau of Reporting**

APPEARANCES: (As heretofore noted.)

DOCUMENT # 400000-DATE

02677 FEB 27 05

1 provide the specific line class code and put it on each
2 customer's order, is justified by the FCC's order that it
3 issued when it rejected BellSouth's second Louisiana 271
4 application, right?

5 A Yes. What the FCC said was if an ALEC has a
6 single routing plan for all its customers, which you could
7 read to mean all its customers in BellSouth's nine-state
8 region, then BellSouth should be able to figure out AT&T's
9 choice. And we agree. If they only have one choice and
10 AT&T says for all of my customers send it to any one of
11 these options, any one of those options, we will know what
12 to do. It's only where it becomes situational that we
13 don't know what to do and we need input from AT&T.

14 Q Well, the FCC also said that BellSouth should
15 not require the competitive LEC to provide the actual line
16 class code if BellSouth is capable of accepting a single
17 code region-wide, right?

18 A That's right. But that's back to the same --
19 back to the same logic, I think. Yes, we don't -- and, in
20 fact, we don't ask you to put a line class code
21 designation on your order if we know what your choice is.
22 For example, in Atlanta, Georgia in BellSouth's Peachtree
23 Place central office, AT&T and BellSouth have worked
24 together, since we preprogram those line class codes, you
25 pass us an order that has got that single choice on it,

1 you don't have to specify a line class code and the order
2 flows-through well.

3 Q So the real nub here is that we disagree on what
4 the FCC meant in this order, right?

5 A Apparently so.

6 Q And BellSouth is capable of accepting a single
7 code region-wide to route to AT&T's operator service
8 platform, right?

9 A Yes.

10 Q Not a line class code, but an indicator?

11 A Well, yes. And in a fashion we are doing that
12 with what we have done for AT&T in BellSouth's Peachtree
13 Place central office. What we did was build logic into
14 part of the ordering system that told BellSouth based on
15 the class of service, the given central office, and the
16 blocking features that came across on AT&T's order, we
17 built those line class codes in a system called LESOG,
18 L-E-S-O-G.

19 That system looks in its tables and says, okay,
20 given that combination of class of service, blocking
21 levels, and the central office involved, this is the right
22 line class code to use. So that's what we are doing. And
23 we are in conformance with the FCC's requirement that we
24 take a single indicator. Your single indicator is you
25 have told us what your default plan is, and where you

ATTACHMENT 65

DECLARATION OF JAY M. BRADBURY

Selective Call Routing Using Line Class Codes

Selective Call Routing Using Line Class Codes

**CLEC
Information Package**

May 17, 2001

(Version 1)

Selective Call Routing Using Line Class Codes

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Selective Call Routing Using Line Class Codes

Introduction and Scope

This Product Information Package is intended to provide to CLECs a product description and general ordering information specific to the service described herein.

Detailed ordering guidelines are provided in documents located on the BellSouth Interconnection Web site.

The information contained in this document is subject to change. BellSouth will provide notification of changes to the document through the CLEC Notification Process.

Please contact your BellSouth Account Manager, if you have any questions about the information contained herein.

Selective Call Routing Using Line Class Codes

Revisions

This is the initial version of this service's Information Guide.

Selective Call Routing Using Line Class Codes**Product Name**

Selective Call Routing Using Line Class Codes

Service Description

BellSouth's Operator Services & Directory Assistance (OS/DA) Branding feature provides Unbranded and/or Custom Branded Operator Services provided by BellSouth operators to Competitive Local Exchange Companies (CLECs) reselling BellSouth telecommunications services (Reseller) or utilizing unbundled local switching (UNE Port CLEC). Custom Branding provides definable announcements to the CLEC's end users prior to placing them in queue or connecting them to an available operator or Automated Operator System. The BellSouth provided Unbranded option does not identify a specific company brand name when connecting the end user to an operator.

Selective Call Routing using Line Class Codes (SCR-LCC) provides the capability for a CLEC to have its OS/DA calls routed to BellSouth's OS/DA platform for BellSouth provided Custom Branded or Unbranded OS/DA or to its own or an alternate OS/DA platform for Self-Branded OS/DA. SCR-LCC is only available if line class code capacity is available in the requested BellSouth end office switches.

Where available, CLEC-specific and unique line class codes are programmed in each BellSouth end office switch where the CLEC intends to serve end users with customized OS/DA branding. The line class codes specifically identify the CLEC's end users so OS/DA calls can be routed over the appropriate trunk group to the requested OS/DA platform. Additional line class codes are required in each end office if the end office serves multiple NPAs (i.e., a unique LCC is required per NPA), and/or if the end office switch serves multiple rate areas and the CLEC intends to provide CLEC-branded OS/DA to its end users in these multiple rate areas.

CLEC dedicated trunking is required and must be ordered from each end office to the BellSouth TOPs tandem for Custom Branded OS/DA and to the appropriate point of interface for Self-Branded OS/DA. BellSouth will provide the trunking on shared trunk groups for Unbranded OS/DA.

In addition to supporting selective routing for customized OS/DA branding, line class codes are also utilized to provision end user specific call blocking/restrictions, optional dialing plans, measured versus flat rate pricing plans and multi-line hunting in 5E switches. Therefore, the CLEC-specific line class codes must be programmed to include the handling of these services as well as specific OS/DA branding. The SCR-LCC ordering forms will prompt the CLEC to choose if such other services will be needed and allow such services to be listed on the service request.

When utilizing SCR-LCC to establish an OS/DA branding option, the CLEC may select one of two types of OS/DA Branding Defaults. The Branding Default applies when no specific OS/DA branding instructions are provided on the Local Service Request (LSR). The CLEC may select the Standard OS/DA Branding Default, which is BellSouth, or it may select a Customized Branding

Selective Call Routing Using Line Class Codes

Default. Specific instructions and requirements concerning the Branding Default are explained further in this guide.

Pre-Ordering**Availability**

The availability of this service is dependent on the specific terms of the contract between BellSouth and the CLEC. Furthermore, this service is offered on a first come, first serve basis and is dependent on the availability of Line Class Codes in the requested BellSouth switch.

Pre-Ordering Applications (included within this guide)

1. CLEC Selective Routing Service Inquiry
2. CLEC Selective Routing Ordering Document
3. Selective Routing End Office Detail Information

CLEC Selective Routing Service Inquiry

The CLEC notifies BellSouth of its intent to order SCR-LCC for OS/DA Branding by submitting the CLEC Selective Routing Service Inquiry form. On this form, the CLEC must include its desired due date, contact information, form issuance date, CLLI codes of the BellSouth end offices where it desires SCR, the NPA that will be affected by SCR and the number of Line Class Codes desired for that CLLI/NPA combination. If the CLEC desires multiple NPAs in a CLLI to be affected by SCR, each CLLI/NPA combination will need to be listed on an individual line and unique Line Class Codes for such combinations will be necessary.

The number of Line Class Codes to be listed on this form will be determined by the completion of the CLEC Selective Routing Ordering Document.

CLEC Selective Routing Ordering Document

This form must be completed and submitted to the CLEC's Account Team along with the CLEC Selective Routing Service Inquiry. This form must be provided for each BellSouth end office where the CLEC desires SCR-LCC. In addition to the CLEC's contact information, end office CLLI code and state, the following fields must be completed:

1. **Option** – This field identifies the call blocking/restriction (CREX) option desired for the Line Class Code. Each option requires its own unique Line Class Code. Refer to the tables on page 3 for the possible Option choices. If a CREX option is not requested to apply with specific OS/DA branding and therefore unique Line Class Codes are not established, that CREX option shall not be able to be ordered with CLEC-specific OS/DA Branding.
2. **NPA** – This field identifies the desired NPA to be affected by SCR-LCC. Each NPA per CLLI requires its own line on this form or unique Line Class Code.

Selective Call Routing Using Line Class Codes

3. **Line Class** – This field identifies the Line Class of Service that will be affected by SCR-LCC. Refer to page 4 for possible selections. POTS should be selected for Residential and Business unbundled ports, port/loop switched combinations and UNE-P.
4. **ODP (Optional Dialing Plan) (Y/N)** – BellSouth provisioned optional dialing plans require unique Line Class Codes. If the CLEC desires SCR-LCC for UNE port or Resale USOCs that include optional dialing plans, then "Yes" should be listed in this field. Furthermore, "No" should be listed if the CLEC desires SCR-LCC to affect only basic dialing plans.
5. **Flat/Meas (Flat or Measured Service)** – This field identifies whether the service is flat rated or measured rated, as separate Line Class Codes are required for each. Unbundled ports, switched port/loop combinations and UNE-P are measured services. Resale, however, may be a measured or flat service. For example, Resellers desiring SCR-LCC on a resold 1FR must request flat rated Line Class Codes. Additionally, measured Line Class Codes may be used for measured Resale services and unbundled ports, switched port/loop combinations and UNE-P.
6. **MLH Hunt (Multi-line Hunting) (Y/N)** – Multi-line Hunting requires unique Line Class Codes in 5E switches. If Multi-line Hunting is desired select "Yes" and if it is not select "No". If both options are desired, then separate lines will need to be completed. If the applicable BellSouth switch is not a 5E, then completing this field is not necessary.
7. **0- Brand 1/2/3/4** – This field allows the CLEC to select the level of 0- branding. The numbers represent the following: 1-BellSouth Brand, 2-No Brand or Unbranded, 3-Custom Branded and 4-Self Branded.
8. **DA Brand 1/2/3/4** - This field allows the CLEC to select the level of DA branding. The numbers represent the following: 1-BellSouth Brand, 2-No Brand or Unbranded, 3-Custom Branded and 4-Self Branded.
9. **0+ Local Brand 1/2/3/4** - This field allows the CLEC to select the level of 0+ Local branding. The numbers represent the following: 1-BellSouth Brand, 2-No Brand or Unbranded, 3-Custom Branded and 4-Self Branded. 0+ intralata toll calls and 0+ interlata toll calls shall be routed to the end user's LPIC'd and PIC'd carriers respectively.
10. **611 Customized Routing** – This field allows the CLEC to select SCR to its own platform for its end user dialed 611 calls. For BellSouth retail end users in Georgia, Florida, North Carolina and South Carolina, 611 is BellSouth's repair line. This capability is only offered in these states and applies only to Self Branding OS/DA. Select "Yes" if 611 SCR is desired and "No" if it is not.
11. **Default Branding** - The Standard Default Branding for SCR-LCC is BellSouth Branding if no branding is identified on the CLEC's Local Service Request (LSR). However, the CLEC may choose to have Customized Default Branding. This allows a CLEC to select a single specific OS/DA branding option by class of service and such arrangement shall be provided as the default, meaning that such branding shall be provided without specific

Selective Call Routing Using Line Class Codes

instructions placed in the LSR. Customized Default Branding requires BellSouth to program its ordering systems and will take three to six months to develop for each request.

Within this field, list either BellSouth or Customized for each Line Class of service. For POTS, the branding option may be divided between residence and business and should be listed accordingly (e.g. Residence – BellSouth).

Each line completed on the CLEC Selective Routing Ordering Document, results in a unique Line Class Code. The sum of the Line Class Codes for each CLLI should be populated accordingly on the CLEC Selective Routing Service Inquiry.

Upon submitting these two forms to the BellSouth Account Team, BellSouth will determine if the quantity of requested Line Class Codes are available in the requested BellSouth end office switches. If they are and if the CLEC is establishing Custom Branded or Self Branded OS/DA, at this point the CLEC must order dedicated OS/DA trunking with MOSS signaling from the applicable BellSouth end offices to the appropriate BellSouth or alternate service provider OS/DA platforms. This must be complete before the Line Class Codes are built in the BellSouth end office switches, as they must be directed to specific trunk groups and tested.

Selective Routing End Office Detail Information Form

If dedicated trunking is required and once it has been established, the Selective Routing End Office Detail Information Form must be completed and submitted to the Account Team. Each Two-Six code for 0-, 0+ Local, DA and 611 for each CLLI/NPA combination must be listed on this form. This provides the information necessary for BellSouth to direct the appropriate Lines Class Codes to the appropriate trunk groups.

Once the Line Class Codes have been established, BellSouth will provide to the CLEC the Selective Routing Codes used in each CLLI for each option by returning the CLEC Selective Routing Ordering Document.

Ordering Information

BellSouth Default Branding

When choosing Standard BellSouth Default Branding (i.e. BellSouth OS/DA branding is applied when no OS/DA branding instructions are placed on the LSR), specific information is required on the LSR in order to receive the desired OS/DA Branding when ordering. The CLEC must float the ZSRC FID behind the Line Class of Service USOC followed by the Selective Routing Code in the feature detail field. Again, the Selective Routing Codes will be provided by the BellSouth Account Team during the provisioning of this service.

CREX codes for specific call blocking and restrictions should not be placed on the LSR with this option as such desired functionalities shall be accommodated by the Selective Routing Code. If a

Selective Call Routing Using Line Class Codes

CREX code was not requested as an option when requesting an Selective Routing Code, it may not be ordered to apply to an OS/DA branding option. Such requests will be rejected.

Customized Default Branding

When choosing Customized Default Branding, no specific OS/DA branding instructions are required on the LSR when ordering, and the CLEC desired OS/DA branding shall be applied to the end user's service. With this option the CLEC must place CREX codes that have corresponding Selective Routing Codes on the LSR in order for BellSouth to determine which Selective Routing Codes to automatically apply to the end user's line. If a CREX code is ordered and a corresponding Selective Routing Code has not been established by the CLEC, the order shall be rejected.

Billing Information

- The CLEC must provide BellSouth with a Facility-based OCN and have requested a facilities based Q-account number through its Account team before ordering this service.
- Current BellSouth Billing Account establishment rules require an OS/DA Branding option for each Master Q Account. This service, however, is defined to provide the CLEC the functionality to select multiple branding options within the Master Q Account (but no lower than the Earning Account), as multiple types of service may apply to that single Master Q Account. Therefore, until system changes can be completed, the bill phrase as well as the branding information on the CSR shall reflect the branding option residing on the Master Q Account. The CLEC should refer to the Selective Routing Codes on the CSR to identify the exact type of branding.

Pricing

The specific charges for this service are listed in the Interconnection Agreement between the Parties. There is a nonrecurring charge for the establishment of each Line Class Code in each BellSouth central office. Furthermore, for Unbranded and Custom Branded OS/DA provided by BellSouth Operator Services with unbundled ports, unbundled port/loop switch combinations and UNE-P, monthly recurring usage charges shall apply for the UNEs necessary to provide the service, such as end office and tandem switching and common transport. A flat rated end office switching charge shall apply to Self-Branded OS/DA when used in conjunction with unbundled ports, unbundled port/loop switch combinations and UNE-P.

BELLSOUTH

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CLEC Selective Routing Service Inquiry

Customer's Desired Due Date (MMDDYYYY)		Issue Date (MMDDYYYY)		INQUIRY Number (PON Number)	
Account Exec. Name			(Area Code) Telephone Number		(Area Code) Fax Number
Customer Name			(Area Code) Telephone Number		(Area Code) Fax Number
Originator Name			(Area Code) Telephone Number		(Area Code) Fax Number
State			NISC USE ONLY		
CLLI	NPA	Number of LCC's Desired (See Note 1)	Number of Rate Centers	Capacity Available (Y,N)	Maximum Available (See Note 2)

1. Note to NISC-CTG: Refer to BSP 900-100-820BT for LCC Reservation Provisioning & Turn-Up Details.
2. If capacity not sufficient to support all requested LCC(s), indicate maximum available.
3. Use additional sheets as needed.

[illegible]

1. Note to NISC-CTG: Refer to BSP 900-100-820BT for LCC Reservation Provisioning & Turn-Up Details.
2. If capacity not sufficient to support all requested LCC(s), indicate maximum available.

BellSouth

CLEC

Selective Routing Ordering Document

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Page 1

Customer Name										(Area Code) Telephone Number			(Area Code) Fax Number	
Account Exec. Name										(Area Code) Telephone Number			(Area Code) Fax Number	
CLI					State					Office Type				
BST USE ONLY				CLEC USE ONLY										
	SRC	LCC Used	LTG	Option	NPA	Line Class	ODP (Y/N)	Flat/ Mess	MLH Hunt (Y/N)	0- Brand 1/2/3/4	0A Brand 1/2/3/4	0+ Local Brand 1/2/3/4	611 (Repair) (Y/N)	Branding Default (BST/Customized)
1														
2														
3														
4														
5														
6														
7														
8														
9														
10														
11														
12														
13														
14														
15														
16														
17														
18														
19														
20														
Note 1. Service Levels 1-BST Brand 2- No Brand 3- Custom Brand 4- Self Brand														
Note 2. SRC code is 5 digit code assigned by LCCAM. LCC Used is 3 digit LCC input by CTG. The LCC is the last 3 digits of the SRC.														
Note 3. ODP plans are not available with flat rate service.														
Note 4. 611 is only available in Georgia, Florida, North Carolina, and South Carolina.														

Comments/

BELLSOUTH

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Page 2

Selective Routing End Office Detail Information

	Office CLLI	NPA RAC	TS Code 0-	BST Use TGN	TS Code 0+ Local	BST Use TGN	TS Code DIR ASST	BST Use TGN	TS Code 611	BST Use TGN
1										
2										
3										
4										
5										
6										
7										
8										
9										
10										
11										
12										
13										
14										
15										
16										
17										
18										
19										
20										

Notes/Comments

BELLSOUTH

Customized Calling Restrictions (CREX)

Table 1

Non-Centrex Like Services

OPTIONS	BLOCKS
UNR	No Blocking (Unrestricted)
1	1+, 0+, 0-, 00, 01+, 011+, 411, 1411, Pulselink, 976, 900, N11
2	0-, 0+, 00, 01+, 976, Pulselink
3	1+, 0-, 0+, 00, 01+, 011+, 900
4	900, 976
5	976
6	900, 976, N11
7	011, 1010XXX+011
A	Same as CREX 1, but also blocks mandatory ext calling plans
B	Same as CREX 2, but also blocks mandatory ext calling plans
W	0-, 0+, 00, 01+, 011+, 976
X	900, 976, 011+
Y	900, 976, N11, 011+
Z	976, 011+
SRG	1+, 1010XXX 1+, 900, 976 (Sends ANI 07)
SRGBX	1+, 1010XXX 1+, 900, 976 (Sends ANI 07) OCP (NC) PBX
SRGCO	1+, 1010XXX 1+, 900, 976 (Sends ANI 07) OCP (NC Only)

Notes:

- Options 1 through SRGCO cannot be combined.
- If 0- or 0+ is custom routed, then option 1, 2, 3, A, B, or W cannot be selected.
- If Dir ASST is Custom Routed then option 1 or A cannot be selected.
- SRG requires ANI 07 in 1AESS switches.

Table 2

Centrex Like Services

OPTIONS	Blocks
UNR	No Blocking (Unrestricted)
Deny Orig.	Blocks Originating Calls
Deny Term.	Blocks Terminating Calls
1	900, 976
2	011+
3	N11
4	411
5	Toll 1+, 011+, 900, 976
6	ELCA and Toll 1+, 011, 900, 976
SRGPL/SRG	1+, 1010XXX 1+, 900, 976
Station Rest 1	1AESS Only- Fully Restricted Incoming and Outgoing
Station Rest 2	1AESS Only- Fully Restricted Incoming
Station Rest 3	1AESS Only- Fully Restricted Outgoing
Station Rest 4	1AESS Only- Semi Restricted Incoming and Outgoing
Station Rest 5	1AESS Only- Semi Restricted Incoming
Station Rest 6	1AESS Only- Semi Restricted Outgoing

Notes:

- Deny Originating cannot have option 1 through SRG/SRGPL.
- Option 5 cannot be combined with Option 1, 2, 6, or SRG/SRGPL.
- Option 6 cannot be combined with Option 1, 2, 5, or SRG/SRGPL.
- 1AESS Station Restriction 1,3,4, or 6 cannot have Option 1 thru SRG/SRGPL.
- If Dir Asst is Custom Routed, Then Option 4 cannot be selected.
- SRG/SRGPL cannot be combined with Option 1 through 6.

LINE CLASS

LINE CLASS	DESCRIPTION
POTS	Plain Old Telephone Service
COIN	Coin Lines
HOTL	Hotel/Motel
PBX	Private Branch Exchange
ISDN	Integrated Services Directory Number
WATS	Wide Access Telephone Service
PSTG	Prestige
CENTREX	Centrex Like Service

Note: Only one Line Class can be selected per CLEC LCC.

ATTACHMENT 66

DECLARATION OF JAY M. BRADBURY

EXCEPTION 69
BellSouth Florida OSS Testing Evaluation

Date: June 12, 2001

EXCEPTION REPORT

KPMG Consulting has identified an exception as a result of the POP Functional Evaluation (TVV-1).

Exception:

BellSouth does not provide an accurate method for assigning the Universal Service Order Code (USOC) to request BellSouth's Operator Services & Directory Assistance (OS/DA) Branding feature. (TVV1)

Background:

BellSouth's OS/DA Branding feature enables Competitive Local Exchange Companies (CLECs) to select Unbranded and/or Custom Branded Operator Services provided by BellSouth operators. Custom Branding identifies a CLEC-defined company name to the CLEC's end users, prior to being placed in queue, or prior to being connected to applicable operator services. The Unbranded option does not identify a specific company name when connecting a CLEC end user to an operator.

USOCs are codes used to identify features, and their associated tariffs, in a service request. BellSouth business rules specify, "The CLEC must float the ZSRC FID behind the Line Class of Service USOC followed by the Selective Routing Code in the feature detail field."¹

KPMG Consulting submitted a Selective Routing Service Inquiry form to the BellSouth Account Manager, and obtained Line Class of Service Codes and Selective Routing Codes to be used in association with the OS/DA service request as outlined in BellSouth's business rules.

Issue:

The instructions for identifying the Line Class of Service USOC on the Local Service Request (LSR) are incomplete. BellSouth does not provide feature "USOCs, FIDs, or TCIF maintained EDI codes" as required by the BellSouth business rules.²

¹ See *Selective Call Routing Using Line Class Codes CLEC Information Package*, Version 1, May 17, 2001, page 8. This document can be found at the following URL:

<http://www.interconnection.bellsouth.com/products/html/unes.html>

² See *BellSouth Business Rules for Local Ordering – OSS99, Issue 9N May 31, 2001*, pages 1567 & 1568.

This document can be found at the following URL:

<http://www.interconnection.bellsouth.com/guides/html/leo.html>

KPMG Consulting, Inc.

6/12/2001

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EXCEPTION 69

BellSouth Florida OSS Testing Evaluation

Without a feature code for an OS/DA feature, KPMG Consulting was unable to process the service requests, using any electronic interface. Service requests for OS/DA are rejected by BellSouth's front-end edits when the appropriate code on the feature code field of the Resale Service (RS) form is not specified.

Furthermore, the instructions on how to populate the feature detail field do not clearly indicate whether the ZSRC Field Identifier precedes the Line Class of Service USOC or not.

Impact:

BellSouth's incomplete instructions relating to USOCs for the OS/DA feature may impact a CLEC in the following ways:

- **Decrease in Customer Satisfaction.** A misidentification of a CLEC's operator assistance service might negatively impact a customer's view of a CLEC's service quality.
- **Increase in Operating Costs.** Ordering problems might require additional CLEC resources before completion. Delays in problem resolution might increase the effort CLEC resources must expend before successfully processing individual OS/DA service requests.